

Hatton, Scott@Waterboards

From: Ruby, Tim <Tim.Ruby@delmonte.com>
Sent: Tuesday, September 02, 2014 10:54 AM
To: Hatton, Scott@Waterboards
Cc: Pitts, Ron; Pande, Carolyn; Melot, Ron; Melkonian, Ron
Subject: Del Monte Foods Plant #24 -- Proposed WDR Changes/ Response to Comments

We have reviewed the changes that you made to the subject Tentative WDRs for our Hanford, CA Plant #24 forwarded under cover of your email dated August 29, 2014. Our suggested changes/ modifications follow:

WDR, Finding 36, Page 12 (Suggested Changes for Clarity)**

36. Based on the discharge quality that is representative of processing good, moderate, and poor quality tomatoes, consistent compliance with the performance based effluent limitation for EC of 1,000 umhos/cm (annual average) (Effluent Limitation C.1, Page 20) and the Basin Plan discharge effluent chloride limitation of 175 mg/L (maximum daily) for discharges that may recharge to good quality groundwater (Effluent Limitation C.2, Page 20) is not immediately practicable. Therefore, Provision G4., Pages 22 – 24 includes a compliance schedule to allow the Dischargers to come into compliance with the Effluent Limitations.

WDR, Effluent Limitations C.1 and C.2, Page 26 (Suggested Changes for Clarity)**

1. As determined by collecting samples from monitoring location EFF-001, the electrical conductivity of wastewater discharged to the LAA, prior to mixing with irrigation water, shall not exceed an annual average of 1,000 umhos/cm interim annual average limit of 2,000 umhos/cm and a final annual average limit of 1,000 umhos/cm, subject to the Compliance Schedule provided in Provision G.4, Pages 22-24, of this WDR.
2. As determined by collecting samples from monitoring location EFF-001, the chloride concentration of wastewater discharged to the LAA, prior to mixing with irrigation water, shall not exceed an daily maximum of 175 mg/L interim annual average limit of 210 mg/L and a final daily maximum limit of 175 mg/L, subject to the Compliance Schedule provided in Provision G.4, Pages 22-24, of this WDR.

****Please note that the Basin Plan does not explicitly state that discharges to areas that may recharge to good quality groundwater shall at all times not exceed a chloride content of 175 mg/L (see Discharges to Land, No. 4, Last Bullet, Page IV-11). Therefore, we request that our final chloride effluent limit be changed/ modified to a monthly or preferably annual average limit of 175 mg/L.**

WDR, Provision G.4, Pages 22-24 (Shift Due Dates Slightly)

Task	Description	Date Due
1	Submit a work plan...	(<u>9-12</u> months following the adoption of this Order).
2	Begin implementation...	In accordance with the approved Task 1 schedule, but no later than (<u>12</u> <u>15</u> months from the adoption date of this Order).
3	Submit annual progress...	Beginning 1 February <u>2016-2017</u> , by the first day of February each year until the Dischargers have completed Task 4.
4	Submit technical...	In accordance...
5	Begin implementing...	In accordance with the approved Task 4 schedule, but no later than (<u>54</u> <u>60</u> months from the adoption of this Order).
6	Submit annual progress...	Beginning 1 February <u>2019</u> <u>2020</u> , by the first day of February each year until the Dischargers have completed Task 7.

Thank you for providing us with the opportunity to review/ comment on the Response to Comments and the preliminary changes that you have made to the Tentative WDRs. We are available to discuss our proposed changes via phone or email as needed.

Sincerely,

DEL MONTE FOODS, INC.

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